REMARKS

In response to Examiner's rejection of pending claims 1-20, Applicant respectfully asks Examiner for reconsideration of the application and pending claims 1-20 based on the following remarks.

Claim Rejections – 35 U.S.C. § 102

The Examiner has rejected claims 1-3, 5, 7-9, 11, 13-16, 18, and 20 under 35 U.S.C § 102, as being anticipated by U.S. Patent No. 5,459,867 to Adams et al. ("Adams"). For the reasons set forth below, Applicant asserts that the cited reference fails to teach or render obvious Applicant's invention as claimed in claims 1-3, 5, 7-9, 11, 13-16, 18, and 20.

Adams discloses an "invention includ[ing] kernels, description tables and device drivers and related methods." (Adams column 2, lines 3-4) "The device description table supports a device attached to the digital computer." (Adams column 2, lines 26-28) "A device description table can process a kernel request issued by the kernel." (Adams column 15, lines 16-17) "A description table implements a state machine and includes two type of information, a code segment (computer program routines) and a data segment which contains data for the state event table." (Adams column 15, lines 58-61) Adams' description table is a file of information relating to actions that the one or more operating system kernels request regarding the device. Specifically, "[t]here is a core group of kernel requests used by each kernel. This allows a description table that can process this

common set of kernel requests to be used with different kernels supporting different operating systems." (Adams column 2, lines 40-43)

Adams description table is an operating system level file that interacts with the supporting operating system kernels. "The kernel and description tables can be loaded into the computer memory of a digital computer and are executable by the digital computer." (Adams column 3, lines 24-26)

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims as amended:

> "A method comprising identifying a device by a unique
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> identifier stored within the device, obtaining the unique identifier
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> from the device, and using the unique identifier in conjunction
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> with a mapping table, wherein the mapping table contains at least a
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> column containing a plurality of unique identifiers of devices
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> coupled to a column containing a plurality of updateable addresses
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> of drivers specific to each device, to obtain an address of a driver
>
> for the device, and one or more columns that include additional
>
> information about the device, the device driver, or the device and
>
> the device driver."

Applicant's unique identifier is stored within the device, not in computer memory. The unique identifier is specifically an identification field that is part of the device itself and used to look up the device in a mapping table. The unique identifier is not a file stored in a computer.

Adams' description table is a file with code and data segments that is loaded up in

the computer's memory, which interacts with one or more operating system kernels to

provide functionality in the operating system. The functionality and location of

Applicant's unique identifier and Adams' description table are entirely different. Yet,

Examiner indicates the two items are equivalent (Examiner's detailed response, page 3,

lines 3-4). Applicant asserts that the location where these two dissimilar items are

located also illustrates the different functionality. When the computer system is running,

Adams' description table is located in computer memory and functions interactively with

the kernel. Alternatively, Applicant's unique identifier is stored on the device itself,

which plugs into the computer. The computer, through hardware, software, or a

combination of both, can find the driver of the device by reading the unique identifier

stored on the device and looking the device up in a mapping table or otherwise with the

unique identifier. Therefore, because Adams' description table has an entirely different

functionality and location than Applicant's unique identifier, Adams does not teach the

presently claimed invention. Thus, because Adams does not teach the presently claimed

invention, Applicant respectfully submits that Adams does not anticipate claim 1.

Claims 2, 3, and 5 are dependent upon independent claim 1. Thus, for at least the

same reasons advanced above with respect to independent claim 1, Applicant respectfully

submits that Adams does not anticipate claims 2, 3, and 5.

In regard to independent claims 7 and 14, Adams does not anticipate Applicant's

invention as claimed for the same reason as independent claim 1. Again, because

Adams' description table has an entirely different functionality and location than

Applicant's unique identifier, Adams does not teach the presently claimed invention.

Thus, because <u>Adams</u> does not teach the presently claimed invention, Applicant respectfully submits that <u>Adams</u> does not anticipate claims 7 and 14.

Furthermore, claims 8, 9, 11, and 13 are dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that <u>Adams</u> does not anticipate claims 8, 9, 11, and 13.

Additionally, claims 15, 16, 18, and 20 are dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that <u>Adams</u> does not anticipate claims 15, 16, 18, and 20.

As such, <u>Adams</u> does not teach or anticipate Applicant's invention as claimed in pending claims 1-3, 5, 7-9, 11, 13-16, 18, and 20. Applicant respectfully requests withdrawal of the 35 U.S.C. 102 rejection of claims 1-3, 5, 7-9, 11, 13-16, 18, and 20.

Claim Rejections – 35 U.S.C. § 103

The Examiner has rejected claims 6, 12, and 19 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 5,459,867 to Adams et al. ("<u>Adams</u>") in view of Internet Engineering Task Force ("<u>Task Force</u>"), Simple Service Discovery Protocol/1.0, Operating without an Arbiter, October 29, 1999. As discussed above, Adams does not teach, suggest or render obvious Applicant's invention. Task Force does not overcome this deficiency. For the same reasons set forth above in regard to <u>Adams</u> in view of the response to the 35 U.S.C §102 rejection, Applicant asserts that the cited references fail to teach, suggest, or render obvious Applicant's invention as claimed in claims 6, 12, and 19.

Claim 6 is dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Adams and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 12 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Adams and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 19 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Adams and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Thus, Adams and Task Force do not teach, suggest, or render obvious Applicant's invention as claimed in pending claims 6, 12, and 19. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 6, 12, and 19.
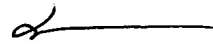
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If a telephone conference would facilitate the prosecution of this application, the

Examiner is invited to contact Michael J. Mallie at (408) 720-8300.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: 6/3/05

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